

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

In re: ASTRALABS, INC., Debtor.	§ § § § §	Case No. 23-10164-smr Chapter 7
--	-----------------------	--

**TRUSTEE’S WITNESS AND EXHIBIT
LIST FOR JANUARY 26, 2024 HEARING**

TO THE HONORABLE SHAD M. ROBINSON, U.S. BANKRUPTCY JUDGE, AND TO ALL PARTIES:

Randolph N. Osherow, not individually but in his capacity as the duly appointed chapter 7 trustee (in such capacity, the “Trustee”), for and on behalf of ASTRALABS, Inc. (the “Debtor”), hereby submits this Witness and Exhibit List in connection with the hearing to be held on January 26, 2024, at 10:00 a.m. (prevailing Central Time) (the “Hearing”), to consider:

- (a) *Objection and Reservation of Rights of CollectiveCrunch Oy to the Chapter 7 Trustee’s Notice of Entry of Order (I) Approving Notice, Sale, and Executory Contract Procedures for Sale of Designated Securities Warrants, Free and Clear of All Liens, Claims, and Encumbrances; and (II) Scheduling Final Sale Hearing* [Docket No. 370];
- (b) *Notice of Trustee’s Receipt of Objections to Notice of Entry of Order (I) Approving Notice, Sale, and Executory Contract Procedures for Sale of Designated Securities Warrants, Free and Clear of All Liens, Claims, and Encumbrances; and (II) Scheduling Final Sale Hearing* [Docket No. 372]; and
- (c) any other matters taken up by the Court at the Hearing.

WITNESSES

The Trustee reserves all rights to call any or all of the following as witnesses at the Initial Hearing, including but not limited to by affidavit, declaration, transcript, or proffer.

- 1. Randolph Osherow, Trustee;
- 2. Chad Harding, Managing Partner, PEAK Technology Partners, LLC;

3. Nihar Patel, former Chief Financial Officer for the Debtor;
4. Joshua Lawton, former Chief Operating Officer for the Debtor;
5. Any witness called or designated by any other party; and
6. Any rebuttal witnesses, as appropriate.

EXHIBITS

The Trustee reserves all rights to introduce and/or request judicial notice of any or all of the following Exhibits as evidence at the Hearing, each as may be amended, and expressly including any filed responses thereto, and any exhibits, schedules, addenda, and any and all other attachments or amendments thereto and thereof:

No.	Description	MARKED	OFFERED	OBJECT	ADMIT
1.	Trustee's Certificate of Service (<i>Notice of Entry of Order (I) Approving Notice, Sale, and Executory Contract Procedures for Sale of Designated Securities Warrants, Free and Clear of All Liens, Claims, and Encumbrances; and (II) Scheduling Final Sale Hearing</i>) [Docket No. 360]				
2.	<i>Notice of Trustee's Receipt of Objections</i> [Docket No. 372] <ul style="list-style-type: none"> • 2-A - P. Ulmann / b-science.net LLC • 2-B - S. Singh / FLYX Entertainment Inc. • 2-C - V. Hey / Ok Away Pty Ltd. 				
3.	E-mail Correspondence Among S. Singh, C. Harding, J. Ong, and A. Nguyen, January 10–16, 2024 (re: FLYX Entertainment Inc.)				
4.	FLYX Entertainment Inc. Warrant (Sale Asset List No. 127)				
5.	E-mail Correspondence Among V. Hey, J. Ong, and A. Nguyen, January 16–17, 2024 (re: Ok Away Pty Ltd.)				
6.	Ok Away Ptd Ltd. Warrant				
7.	E-mail Correspondence Among R. Vandegriend, J. Ong, and A. Nguyen, January 8–18, 2024 (re: Arya Health Records)				

No.	Description	MARKED	OFFERED	OBJECT	ADMIT
8.	Arya Health Records Warrant (Sale Asset List No. 29)				
9.	E-mail Correspondence Between C. Harding, O. Elmorich, J. Ong, and A. Nguyen, January 11–18, 2024 (The Eventors Inc.) (Sale Asset List No. 153) (<i>For illustrative / exemplary purposes only</i>)				
10.	E-mail Correspondence Between A. Wang and J. Ong, January 16, 2024 (EmberFund) (Sale Asset List No. 103) (<i>For illustrative / exemplary purposes only</i>)				
11.	E-mail Correspondence Among R. Chen, J. Ong and A. Nguyen, January 8–16, 2024 (AutoBizLine, Inc.) (<i>For illustrative / exemplary purposes only</i>)				
12.	(Draft Proposed) Amended List of Sale Assets				
13.	Redline of (Draft Proposed) Amended List of Sale Assets				
14.	Agreed / Proposed Insert re: Final Sale Order (J. Binford)				
15.	Any and all Motions, Notices, pleadings, and other docket items filed of record in the Bankruptcy Case				
16.	Any and all exhibits designated by any other party				
17.	Any and all other exhibits as may be appropriate for rebuttal or impeachment purposes				

Dated: January 19, 2024

Respectfully submitted,

By: /s/ Jay H. Ong
Jay H. Ong
Texas Bar No. 24028756
Thanhan Nguyen
Texas Bar No. 24118479
MUNSCH HARDT KOPF & HARR, P.C.
1717 West 6th Street, Suite 250
Austin, Texas 78703
Telephone: (512) 391-6100
Facsimile: (512) 391-6149
Email: jong@munsch.com
anguyen@munsch.com

**Counsel For Randolph N. Osherow,
Chapter 7 Trustee**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on the 19th day of January 2024, he personally caused true and correct copies of the foregoing document to be served by electronically filing it with the Court using the Court's CM/ECF system, which sent notification to the parties receiving same through such system. A true and correct copy of the document, together with the listed exhibits, was also served via electronic mail on the following parties:

Robert Chamless Lane on behalf of Debtor ASTRALABS Inc
chip.lane@lanelaw.com

Ron Satija on behalf of Andrew Ryan
rsatija@haywardfirm.com

Shane P. Tobin on behalf of U.S. Trustee United States Trustee - AU12
shane.p.tobin@usdoj.gov

Jason Binford on behalf of various Warrant counterparties
jason.binford@rsbfirm.com

P. Ulmann on behalf of b-science.net LLC
pirmin@b-science.net

S. Singh on behalf of FLYX Entertainment Inc.
shashank@bakstage.ai

V. Hey on behalf of Ok Away Pty Ltd.
veronica@okaway.co

Richard Vandegriend on behalf of Arya Health Records
rvandegriend@aryaehr.com

By: /s/ Thanhhan Nguyen
Thanhhan Nguyen, Esq.